

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

**FOR COURT USE ONLY**

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION**

**In re:**

**IRINA RASKIN,**

**CASE NO.: 1:18-bk-11802-MB**

## CHAPTER: 7

## NOTICE OF SALE OF ESTATE PROPERTY

**Debtor(s).**

**Sale Date: 06/26/2019**

**Time: 11:00 am**

**Location:** Ctrm. 303, U.S. Bankruptcy Court, 21041 Burbank Blvd., Woodland Hills, CA 91367

**Last date to file objections: 06/12/2019**

**Description of property to be sold:** certain residential real property commonly known as

**Terms and conditions of sale:** free and clear of any interests and liens pursuant to 11 U.S.C. §§ 363(b), (f) and (m), and on an "AS-IS, WHERE-IS" basis

**Proposed sale price: \$ 1,734,000.00**

**Overbid procedure (if any):** see attached for overbid procedure

**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

Date & Time: June 26, 2019, at 11:00 A.M.

Location: Ctrm. 303, U.S. Bankruptcy Court, 21041 Burbank Blvd., Woodland Hills, CA 91367

**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Counsel for Ch. 7 Trustee David Seror:  
Nancy Hoffmeier Zamora, Esq.  
Zamora & Hoffmier, APC  
U.S. Bank Tower  
633 West 5th Street, Suite 2600, Los Angeles, CA 90071  
Tel. 213-488-9411; Fax 213-488-9418  
e-mail: zamora3@aol.com

Date: 06/05/2019

1           A. Each potential bidder (other than Buyer as defined in the  
2 Motion for Order Authorizing Trustee to Sell Real Property Free and  
3 Clear of Liens and Interests, Subject to Overbid (the "Motion")) in  
4 order to qualify as a bidder at the hearing on the Motion (the  
5 "Hearing"), shall

6           (1) submit to Trustee, prior to the commencement of the  
7 Hearing, a cashier's check in the amount of at least Eighty-Seven  
8 Thousand Five Hundred and no/100 Dollars (\$87,500.00) (the "Earnest  
9 Money Deposit") made payable to "A&A Escrow." Trustee shall refund  
10 the Earnest Money Deposit if Trustee accepts the bid of another  
11 bidder;

12           (2) bid on the identical terms as, or better terms than,  
13 Buyer as set forth in the Agreement, attached as Exhibit A to the  
14 Motion, including, but not limited to, the "AS-IS, WHERE-IS"  
15 condition of the sale with no contingencies;

16           (3) submit to Trustee prior to the commencement of the  
17 Hearing proof of ability to close escrow unconditionally on or  
18 before fourteen (14) days after entry of the order approving the  
19 motion (the "Sale Order"), and to tender the balance of any bid  
20 made by such bidder, such proof to be deemed acceptable or  
21 unacceptable by Trustee in his sole discretion, subject to approval  
22 by the Court;

23           (4) agree to increase the Earnest Money Deposit to five  
24 percent (5%) of the successful bid amount and deposit such  
25 increased Earnest Money Deposit into the sale escrow (the "Sale  
26 Escrow") at A&A Escrow no later than one day after the Hearing,  
27 i.e., June 27, 2019; and

28           (5) attend the Hearing to participate in the overbidding; and

1 B. The initial overbid shall be a total of \$1,750,000.00,  
2 i.e., \$16,000.00 more than the Sales Price of \$1,734,000.00, and  
3 all additional overbids must be made in minimum increments of  
4 \$10,000.00 over the last stated overbid made on the record.

5 If Highest Bidder fails to close the Sale Escrow on or before  
6 fourteen (14) days after entry of the Sale Order, provided that the  
7 Real Property is vacant, Highest Bidder shall forfeit the Earnest  
8 Money Deposit and the next highest bidder shall pay the next  
9 highest bid to purchase the Real Property within ten business days  
10 of written notification, transmitted via facsimile and/or e-mail,  
11 of Highest Bidder's default.

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

U.S. Bank Tower, 633 West 5th Street, Suite 2600, Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled: **NOTICE OF SALE OF ESTATE PROPERTY** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 06/05/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: U.S. Trustee: United States Trustee, [ustpreion16.wh.ecf@usdoj.gov](mailto:ustpreion16.wh.ecf@usdoj.gov); S Margaux Ross [margaux.ross@usdoj.gov](mailto:margaux.ross@usdoj.gov); Trustee: David Seror, [aquijano@bg.law](mailto:aquijano@bg.law), [C133@ecfbis.com](mailto:C133@ecfbis.com); Trustee's Counsel: Nancy H. Zamora, [zamora3@aol.com](mailto:zamora3@aol.com); Debtor's Counsel: Stella A Havkin, [stella@havkinandshrago.com](mailto:stella@havkinandshrago.com), [havkinlaw@earthlink.net](mailto:havkinlaw@earthlink.net), [r49306@notify.bestcase.com](mailto:r49306@notify.bestcase.com); Counsel for Alex Raskin: Neil C. Evans, [evanstnt@aol.com](mailto:evanstnt@aol.com); Raymond H. Aver, [ray@averlaw.com](mailto:ray@averlaw.com), [averlawfirm@gmail.com](mailto:averlawfirm@gmail.com), [ani@averlaw.com](mailto:ani@averlaw.com), [katya@averlaw.com](mailto:katya@averlaw.com); Alla Tenina, [alla@teninalaw.com](mailto:alla@teninalaw.com), [jenny@teninalaw.com](mailto:jenny@teninalaw.com); Creditor's Counsel: Jerome Kaplan [office@3klaw.com](mailto:office@3klaw.com), [dsКАДin@3klaw.com](mailto:dsКАДin@3klaw.com); Mediator: M. Jonathan Hayes [jhayes@rhmfirml.com](mailto:jhayes@rhmfirml.com), [roksana@rhmfirml.com](mailto:roksana@rhmfirml.com), [rosario@rhmfirml.com](mailto:rosario@rhmfirml.com), [janita@rhmfirml.com](mailto:janita@rhmfirml.com), [susie@rhmfirml.com](mailto:susie@rhmfirml.com), [max@rhmfirml.com](mailto:max@rhmfirml.com), [priscilla@rhmfirml.com](mailto:priscilla@rhmfirml.com), [pardis@rhmfirml.com](mailto:pardis@rhmfirml.com), [russ@rhmfirml.com](mailto:russ@rhmfirml.com)

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 06/05/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor: Irina Raskin, 4047 Falling Leaf Dr., Encino, CA 91316; Debtor's Ex-Spouse: Alex Raskin, 5460 White Oak Avenue, Unit D-314, Encino, CA 91316-4564; Trustee's Broker: William Friedman, Coldwell Banker, 2444 Wilshire Blvd, #102, Santa Monica, CA 90403; Steve Flores, Coldwell Banker, 9229 Sunset Blvd., Suite 320, West Hollywood, CA 90069; Jane Schore, Coldwell Banker, 9229 Sunset Blvd., Suite 320, West Hollywood, CA 90069; Escrow: Antonia Delgado, A&A Escrow Service, 415 N. Crescent Dr., Suite 320, Beverly Hills, CA 90210; Title: Debbie Tognetti, First American Title Company, 4 First American way, Santa Ana, CA 92707; Proposed Buyers: Shadi Abdelnour & Lama M. Abdelnour, c/o Ghada Nakoud, Bruin Trojan Realtors, Inc., 42598 Moonridge Rd., Big Bear Lake, CA 92315; U.S Trustee: S. Margaux Ross, Esq., Office of the United States Trustee, 915 Wilshire Blvd., Suite 1850, Los Angeles, CA 9001; Judge: The Honorable Martin Barash, U.S. Bankruptcy Court, 21041 Burbank Boulevard, Suite 342, Woodland Hills, CA 91367

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 06/05/2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/05/2019  
Date

Cynthia Casas  
Printed Name

/s/ Cynthia Casas  
Signature